The Honorable Paul G. Gardephe United States District Court Southern District of New York 40 Foley Square, Courtroom 705 New York, NY 10007

Re: In re Talkspace, Inc. Securities Litigation, No. 1:22-cv-00163-PGG

## Dear Judge Gardephe:

We write on behalf of the parties in this action to provide an update on the progress of the settlement. The parties have been working diligently and have made progress towards a written settlement agreement. The February 23, 2023 joint status report (ECF No. 76) expressed Plaintiffs would be in position to file a motion for preliminary approval of the expected settlement by April 3, 2023. The process has taken longer than anticipated, however, and due to the upcoming holidays, Plaintiffs anticipate being in position to file preliminary settlement approval papers by May 3, 2023. In the event the parties are unable to reach a final agreement to settle this action, they will promptly notify the Court.

## Respectfully submitted,

ROBBINS GELLER RUDMAN & DOWD LLP SAMUEL H. RUDMAN DAVID A. ROSENFELD EVAN J. KAUFMAN WILLIAM A. MASSA MILBANK LLP SCOTT A. EDELMAN JED M. SCHWARTZ ALLISON S. MARKOWITZ

/s/ Evan J. Kaufman EVAN J. KAUFMAN /s/ Scott A. Edelman

SCOTT A. EDELMAN

58 South Service Road, Suite 200 Melville, NY 11747 Telephone: 631/367-7100 631/367-1173 (fax) srudman@rgrdlaw.com drosenfeld@rgrdlaw.com ekaufman@rgrdlaw.com wmassa@rgrdlaw.com

55 Hudson Yards New York, NY 10001 Telephone: 212/530-5000 sedelman@milbank.com jschwartz@milbank.com amarkowitz@milbank.com Judge Paul G. Gardephe March 29, 2023 Page 2

ROLNICK KRAMER SADIGHI LLP LAWRENCE M. ROLNICK MARC B. KRAMER MATTHEW PELLER ANNA MENKOVA 1251 Avenue of the Americas New York, NY 10020 Telephone: 212/597-2838 lrolnick@rksllp.com shecht@rksllp.com mpeller@rksllp.com amenkova@rksllp.com

Co-Lead Counsel for Plaintiffs

Counsel for Defendants Talkspace, Inc., Hudson Executive Capital LP, HEC Sponsor LLC, HEC Master Fund LP, Douglas L. Braunstein, Douglas G. Bergeron, Jonathan Dobres, Robert Greifeld, Amy Schulman, and Thelma Duggin

COHEN & GRESSER LLP MARK S. COHEN DAVID F. LISNER

/s/ David F. Lisner

## DAVID F. LISNER

800 Third Avenue, 21st Floor New York, New York 10022 Telephone: 212-707-1329 mcohen@cohengresser.com dlisner@cohengresser.com

Counsel for Defendant Oren Frank

COLE SCHOTZ P.C. MICHAEL S. WEINSTEIN BRADLEY P. POLLINA

/s/ Michael S. Weinstein
MICHAEL S. WEINSTEIN

1325 Avenue of the Americas 19th Floor New York, NY 10022 Telephone: 212/752-8000

Counsel for Defendant Mark Hirschhorn

All Counsel of Record (via ECF)